

PHOSPHITE MANUFACTURERS CONSORTIUM

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201-15723

December 9, 2004

Administrator Michael O. Leavitt
US Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116
Attention: Chemical Right-to-Know Program
oppt.ncic@epa.gov and chem.rtk@epa.gov

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Re: Change in Status of HPV Commitment

Dear Administrator Leavitt:

I am writing on behalf of the Phosphite Manufacturers Consortium (formerly the Phosphite Producers HPV Consortium) to inform EPA of changes in the name of the Consortium, its members and the chemicals being addressed.

On November 30, 1999, the Phosphite Producers HPV Consortium (PPHC) submitted a letter to the Agency committing to address four chemicals under the US HPV Challenge Program. A fifth compound, phosphorous acid, triisodecyl ester (TDP; CAS No. 25448-25-3) was added at the time the robust summaries and test plan were submitted to EPA on September 11, 2001. The Consortium is committed to the following:

Chemical Name	CAS No.
Phenol, nonyl-, phosphite (3:1) (TNPP)	26523-78-4
Phosphorous acid, triphenyl ester (TPPi)	101-02-0
Phosphorous acid, isodecyl diphenyl ester (DPDP)	26544-23-0
Phosphorous acid, diisodecyl phenyl ester (PDDP)	25550-98-5
Phosphorous acid, triisodecyl ester (TDP)	25448-25-3

TNPP has been addressed as a single compound (www.epa.gov/chemrtk/phsphite/c12615tc.htm); the other four materials are covered in the Isodecyl/Phenyl Phosphite Category (www.epa.gov/chemrtk/ppipcc/c13182tc.htm).

Membership in the Consortium at the time of the initial commitment letter included Dover Chemical Corporation and GE Plastics. Since then, membership in the Consortium has changed and as a result, we are currently operating under the name Phosphite Manufacturers Consortium (PMC). Accordingly, all references to Phosphite Producers HPV Consortium should be updated to Phosphite Manufacturers Consortium.

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Current PMC members are: Akcros Chemicals, Ltd., Crompton Corporation and Dover Chemical Corporation. (Note that Crompton Corporation notified EPA on May 12, 2004 that they acquired interest from GE in the phosphite compounds and the associated commitment under the US HPV program.) The following table reflects the individual company commitments for the two test programs.

Company	TNPP (CAS 26523-78-4)	Isodecyl/Phenyl Phosphite Category: TDP (CAS 25448-25-3); PDDP (CAS 25550-98-5); DPDP (CAS 26544-23-0); and, TPPi (CAS 101-02-0).
Akcros Chemicals, Ltd.		X
Crompton Corporation	X	X
Dover Chemical Corporation	X	X

PMC has been actively addressing its HPV commitments for all five compounds and will soon be submitting to the Agency additional robust summaries for the testing necessary to satisfy our HPV commitment.

Please note that for all of the above chemicals, I now serve as the Administrative and Technical Contact on behalf of PMC.

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If you have any questions or would like to discuss this issue, please do not hesitate to contact me.

Sincerely,

Robert J. Fensterheim
Executive Director